

Marcus Leinart
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ATTORNEY FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE: §
§
MARK EDWARD RICE § **CASE NO. 23-42473-ELM-13**
§
Debtor § **CHAPTER 13**

RV DEPOT OF CLEBURNE § **HEARING DATE: 9/7/2023**
§ **HEARING TIME: 1:30 PM**
Movant §
§
vs. §
§
MARK EDWARD RICE §
§
Debtor §

DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM STAY

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Debtor, Mark Edward Rice, in the above-styled and numbered case and file this his, Response to the Motion for Relief from Automatic Stay filed by Ally Financial, Inc, ("Movant") in regard to the collateral referenced in Movant's Motion.

Debtor would respectfully show:

1. The allegations of Movant contained in paragraphs 1-4 of the Motion are admitted.
2. The allegations of Movant contained in paragraphs 10, 13-14, and 16 of the Motion are denied.

3. The allegations of Movant contained in paragraphs 5-9, 11-12, and 15 of the Motion may not be admitted or denied as the Debtor is without sufficient knowledge or information to form a belief as to the truth and therefore make a qualified denial.

WHEREFORE, PREMISES CONSIDERED, Respondent prays Movant's Motion for Relief from Automatic Stay be denied and for any such other and further relief in law and equity as the Court deems just.

DATED: September 1, 2023

Respectfully Submitted,

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By: /s/ Marcus Leinart
Marcus Leinart
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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2023, I did serve a true and correct copy of the foregoing to the following interested parties, by United States Mail, First Class, and to those parties notified electronically:

DEBTOR

Mark Edward Rice
752 N Main #1418
Mansfield, TX 76063

OPPOSING COUNSEL

Wilcox Law, PLLC
PO Box 201849
Arlington, TX 76006

CHAPTER 13 TRUSTEE

Tim Truman
6851 N.E. Loop 820, Ste 300
N. Richland Hills, TX 76180-6608

UNITED STATES TRUSTEE

United States Trustee
1100 Commerce St, Rm 976
Dallas, TX 75242

By: /s/ Marcus Leinart
Marcus Leinart
ATTORNEY FOR DEBTOR